AT&T

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March 3, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

RE: Ex Parte
CC DKT. 97-208 Application by BellSouth Telecommunications, Inc. and BellSouth Long Distance, Inc. for Provisioning of In-Region, InterLata Service in South Carolina.

Dear Ms. Roman Salas:

On Friday February 27, 1998, Karen Weis and I of AT&T and Mark Haddad of Sidley & Austin met with Michael Pryor, Jake Jennings, Katherine Schroder, Jordan Goldstein, and Jennifer Fabian of the Policy and Planning Division of the Common Carrier Bureau; Johnson Garrett of the Office of the General Counsel's Competition Division; and Don Stockdale of the Office of the Bureau Chief of the Common Carrier Bureau. The purpose of this meeting was to discuss technical issues surrounding use of the recent change process to combine unbundled network elements. Attached is a summary of the presentation as well as a copy of a diagram drawn during the presentation which was used to facilitate the discussion.

Two copies of this Notice are being submitted on the next business day to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

Robert W. Quinn, Jr.

Attachments

cc: M. Pryor
J. Jennings
K. Schroder
J. Fabian
J. Goldstein
J. Garrett
D. Stockdale

AT&T has been exploring the feasibility of obtaining remote access to the existing incumbent local exchange carrier ("ILEC") Memory Administration System to allow CLECs to combine unbundled network elements ("UNEs") in ILEC networks. Remote access to ILEC Memory Administration Systems is available today to CENTREX customers for easy administration of blocks of telephone numbers. The customer is permitted to send recent change messages via an interface which communicates those changes, i.e., moves, changes, features, and line addition or deletion, to the ILEC switch. Customers can then add, delete, or change features of a designated set of lines without processing additional orders through the ILEC ordering systems. The ILEC designates which lines can be accessed by the Centrex customers. Some of the more commonly used interfaces include MACSTAR (manufactured by CommTech), CENPAC (American Telecorp), CCRS (Bellcore), DECAS and Centrex Mate (Ameritech's self-developed internal system).

By using remote access to the ILEC Memory Administration System, a CLEC can initiate a Recent Change that logically reconnects the loop and switch by restoring dialtone to the customer's line. The restore change would occur following the disconnection of dialtone through the implementation of a suspend condition on the customer's line. Disconnection of the loop and the port will cause a minimal out of service condition on the customer's line as the suspend and restore updates are communicated to the switch.

The existing infrastructure that would be utilized in this proposed recent change process would include:

1. The CLEC Operational Support Systems ("OSSs"), including the Gateway or other system connectivity between the CLEC systems and the ILEC systems;
2. The ILEC service order and provisioning OSSs, including (a) the Gateway or other system connectivity between the ILEC systems and the CLEC systems, (b) the service order controller system (such as SOAC), and (c) the interface between the service order controller system and, minimally, the ILEC billing system and the ILEC memory administration system (e.g., MARCH which is the name of the Bellcore memory administration system OSS product); and
3. Either a remote recent change to provide connectivity to switches or directly with the ILEC's Memory Administration System.

The following process flow describes the steps required for the proposed recent change process.

1. The CLEC would initiate a Local Service Request ("LSR") for unbundled elements signifying that it will recombine the elements utilizing the recent change proposal.

2. The ILEC would send a FOC (confirming the order) and then on the due date generate a suspend message which would be transmitted to the service order administrative center, i.e., SOAC, which would direct the message to both the

switch (to separate the loop from the port) as well as to the ILEC billing system to stop ILEC billing and initiate CLEC billing.

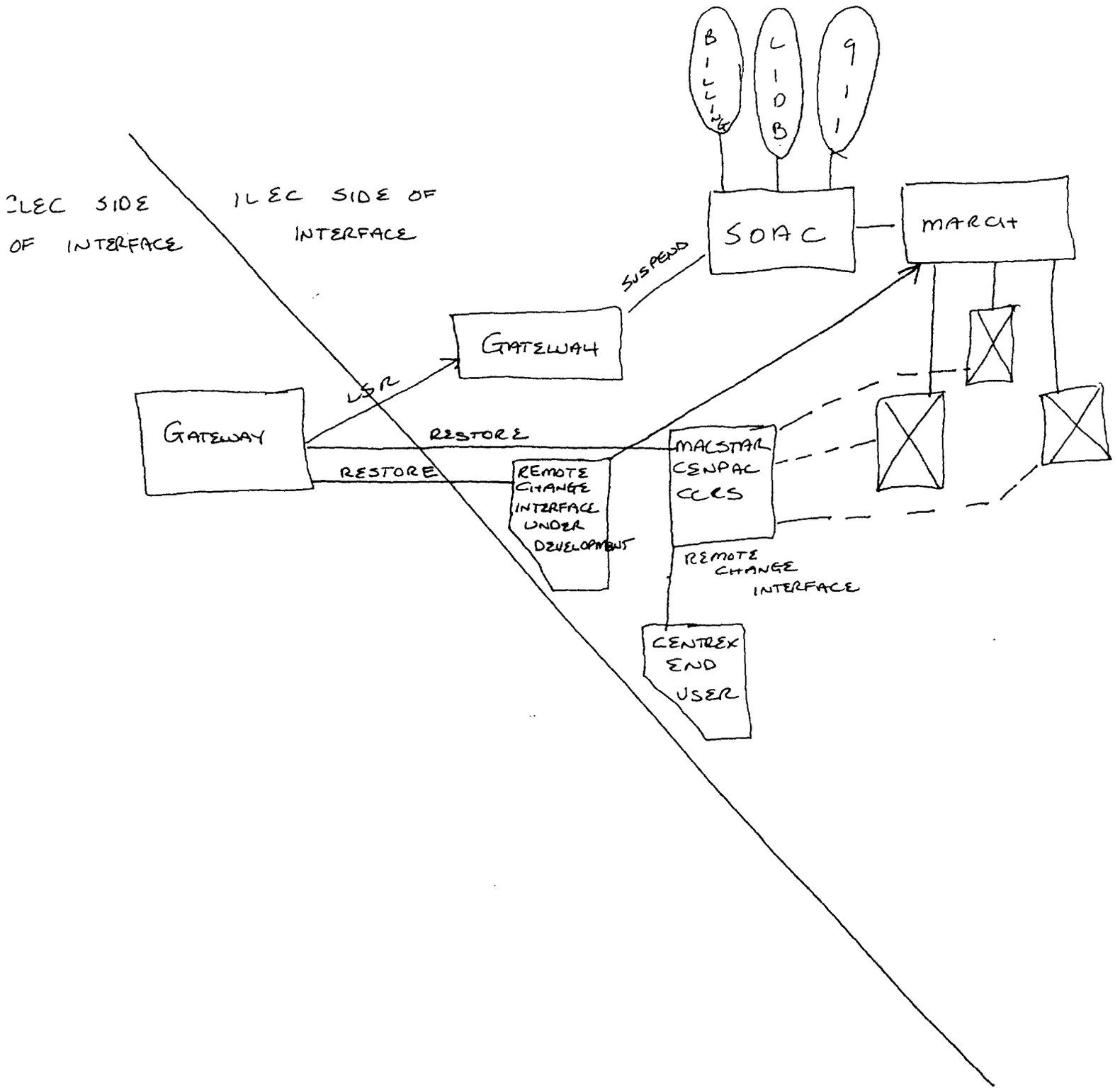
3. The CLEC upon receiving the FOC would generate a restore message containing the required information which would be transmitted via the recent change interface, which would be held in the buffer until it received confirmation that the suspend function was completed.

4. The recent change interface, having received confirmation that the suspend function was complete, would execute the restore function recombining the loop with the port thereby restoring dial tone to the customer line.

In order to accomplish this process, there would have to be three developments to the recent change process used in ILEC networks today. First, connectivity to all switches, or to those requested by a CLEC, from the remote memory administration system must be implemented. Second, a process must be created pursuant to which the ILEC systems send a message back to the remote memory administration system confirming the completion of the suspend function, so that the restore task can be accomplished, recombining the elements for the CLEC customer. Third, the architecture of the remote memory administration system may have to be altered ultimately in order to accommodate multiple CLECs ordering combinations of UNEs from the ILEC. The cost to accomplish these improvements is estimated at between $500,000 -$3,000,000 per ILEC, depending on the size of the ILEC, and should take approximately 6 months to complete.

At least one manufacturer is working on a system which could manage multiple customers information in a single system. That solution may solve the connectivity deficiency and the existing architecture concerns discussed above, but would still require development of the suspend confirmation message.

Attached is a diagram that was drawn on the blackboard during the ex parte which was used to facilitate the discussion.


BILLING
LIDB
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CLEC SIDE OF INTERFACE
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MARCH
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GATEWAY
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RESTORE
REMOTE CHANGE INTERFACE UNDER DEVELOPMENT
MACSTAR CENPAC CCES
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